



• 260 North San Antonio Road., Suite B • Santa Barbara, CA • 93110
• Phone: 805/961-8900 • Fax: 805/961-8901 • www.sbcag.org

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October 16, 2014

Mary D. Nichols

**Chairman
California Air Resources Board
1001 I Street
Sacramento, CA 95814**

Re: Proposed SB 375 Greenhouse Gas Target Setting

Dear Ms. Nichols:

The Santa Barbara County Association of Governments (SBCAG) would like to submit comments in advance of the scheduled Air Resources Board October 23 hearing to discuss the proposal for a new SB 375 target setting process. Through its adopted Regional Transportation Plan-Sustainable Communities Strategy (RTP-SCS), which, if implemented, would achieve greenhouse gas reductions substantially greater than the nominal targets set for it in 2010, SBCAG has underlined its sincere commitment to SB 375's goal of reducing passenger vehicle greenhouse gas emissions through planning for sustainable communities in Santa Barbara County.

As much as SBCAG supports the goal of greenhouse gas reduction, however, we feel that engaging in a new target-setting process at this time would be unproductive, consuming limited time and resources without resulting in greater reductions or substantive changes to SBCAG's adopted RTP-SCS. More important than any nominal targets are the commitments in the adopted RTP-SCS itself, adopted little more than one year ago after an extensive, multi-year planning process. The adopted plan, if implemented, would achieve greenhouse gas reductions of more than 10 percent per capita in 2020 and 15 percent in 2035, well in excess of the nominal zero targets set for SBCAG in 2010. More time is needed at this point to implement the adopted plan and evaluate its effectiveness.

The Focus in the Next Update Should Be On Implementation, Integration and Refinement of Adopted SCSs

In SBCAG's next update of its RTP-SCS, due in 2017 based on SBCAG's four-year planning cycle, SBCAG staff time would be best spent refining and implementing the RTP-SCS adopted in August 2013. SBCAG and other MPOs will also have their hands full retrofitting adopted RTP-SCSs to meet other requirements, such as the new MAP-21 performance measures, in a way that promotes and is consistent with California's emphasis on greenhouse gas reduction. Any remaining available capacity would be best spent studying other region's approaches and emerging best practices more closely. The next update round represents an opportunity for assessment, exchange, and learning, along with refinement and implementation of the long-term strategies already adopted.

Member Agencies

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Because RHNA and Transportation Funding Inputs Will Not Change, Adopted SCS Strategies Will Also Not Change, Regardless of Nominal Targets

SBCAG's existing RTP-SCS is premised on two core sets of inputs: land use and transportation. Neither of these sets of inputs is likely to change in the next plan update. Because the underlying assumptions of the plan will not change, the substance of the adopted RTP-SCS and its core strategies will also not likely change, regardless of the nominal greenhouse gas targets. Since changing targets will not change the substance of the plans, engaging in a new target setting process at this time is not likely to achieve different results.

These two sets of RTP-SCS inputs relate to (1) land use and housing assumptions to accommodate projected population growth, and (2) transportation investments and funding. Land use, housing and growth assumptions are based principally on Census data and the Regional Housing Needs Allocation (RHNA). The RHNA is now on an eight-year update cycle that corresponds with every other RTP-SCS update. It will not change for the 2017 RTP-SCS update. Meanwhile, programmed and planned transportation investments for all modes are fiscally constrained within the RTP-SCS based on estimated available funding. There is no reason at this time to believe that funding estimates will change substantially. As a result, it is unlikely that programmed and planned investments in the transportation network in the adopted RTP-SCS will change fundamentally in the 2017 plan update.

A New Target Setting Process Would Be Time-Intensive, Needlessly Drain Resources and Generate Controversy Without Conferring Any New Benefit

Based on SBCAG's experience in 2010, any SB 375 target setting process will be time-consuming and process-intensive, and quite possibly highly politicized at the local level. SBCAG's experience during the 2010 target setting process was that the exclusive focus on greenhouse gas emissions at the outset of plan development caused the local process to become contentious and obscured other, important common benefits of sustainable communities planning.

SBCAG's adopted RTP-SCS was ultimately successful, in our view, because the plan demonstrated to the satisfaction of many stakeholders that the goal of reducing greenhouse gas emissions and vehicle miles traveled was in line with other important, already recognized regional goals. Achieving (and indeed surpassing) the 2010 greenhouse gas targets would simultaneously help to address a number of outstanding issues important to the region, including jobs-housing balance, increasing commute times and costs, and overall congestion.

Starting the first SCS update with a new round of target-setting would return the region to a sole focus on greenhouse reduction without recognizing the adopted 2013 plan's other benefits or the considerable successes to date. What matters in our view at this point are not so much any nominal targets, but the adopted plan itself. Retracing our steps back to the 2010 target setting process will shift the focus away from the adopted plan's hard-won common vision for the future of the region back to a much narrower focus.

ARB's Focus Should Be On Areas Where the Greatest Greenhouse Gas Reductions Can Be Achieved at the Lowest Cost

To be most effective in implementing the SB 375 mandate, ARB must keep its focus steadfastly on the areas of the state where the greatest emissions reductions can be achieved at the lowest cost. As the enclosed factsheet indicates, these areas focus must inevitably be those with the greatest existing populations and greatest projected growth: the state's largest metropolitan areas, where more than 80 percent of the state's current population resides. SBCAG would oppose any approach that treats the largest metropolitan areas less stringently than the rest of the state, as we understand was recently discussed with ARB staff at an invitation-only "roundtable" meeting of stakeholders on September 5.

Keep to the Eight-Year Cycle Contemplated by SB 375

If, despite these arguments against doing so, ARB is inclined to embark upon a new target setting process now, we request that any new targets not take effect until 2018, consistent with the eight-year timeframe contemplated in the statute, and that the burden in time and public process in developing those new targets be minimized. Making new targets effective in 2018 will respect existing four-year RTP-SCS update cycles and second-round planning processes already underway. MPOs, like SBCAG, which are already a year or more into the next planning cycle will otherwise have difficulty incorporating new targets into their RTP-SCS planning. However, it would make more sense to defer this effort until more data has been collected.

For all of the reasons stated above, SBCAG opposes starting a new SB 375 target setting process at this time. Finally, we recommend that ARB keep the same base year (2005) and metrics (greenhouse gas per capita) used in the first round RTP-SCSs for consistency and to facilitate tracking of progress and comparison over multiple RTP-SCS cycles.

Thank you in advance for considering our comments.

Sincerely,

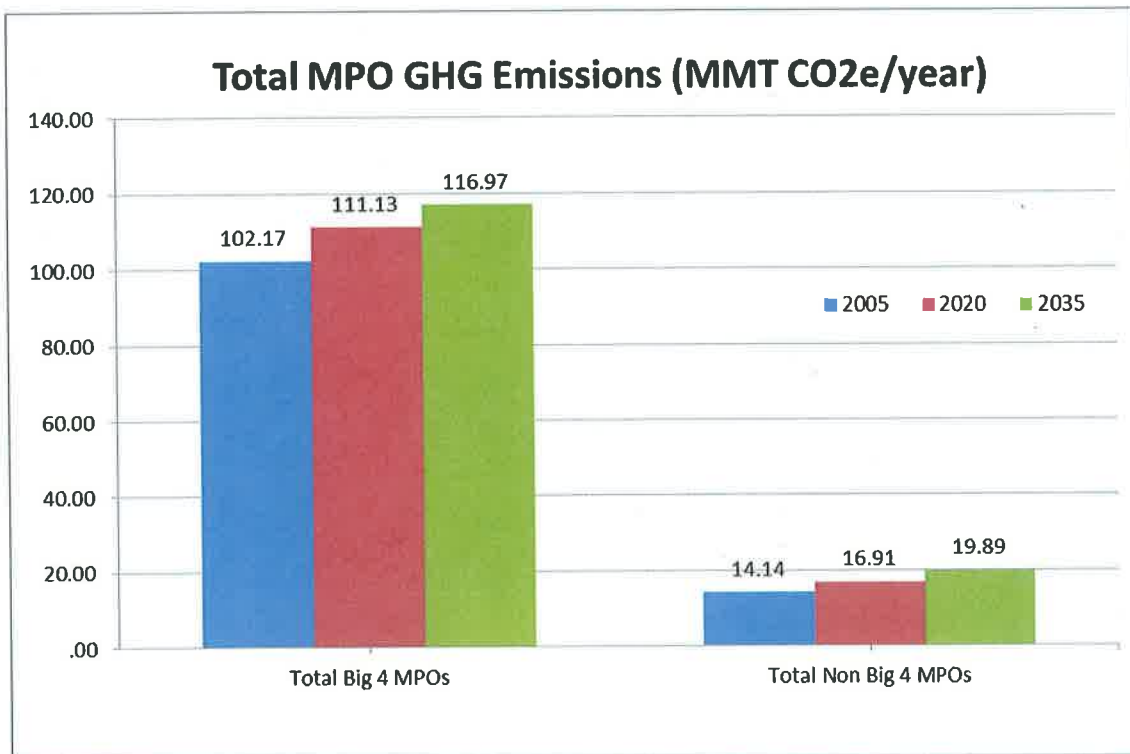
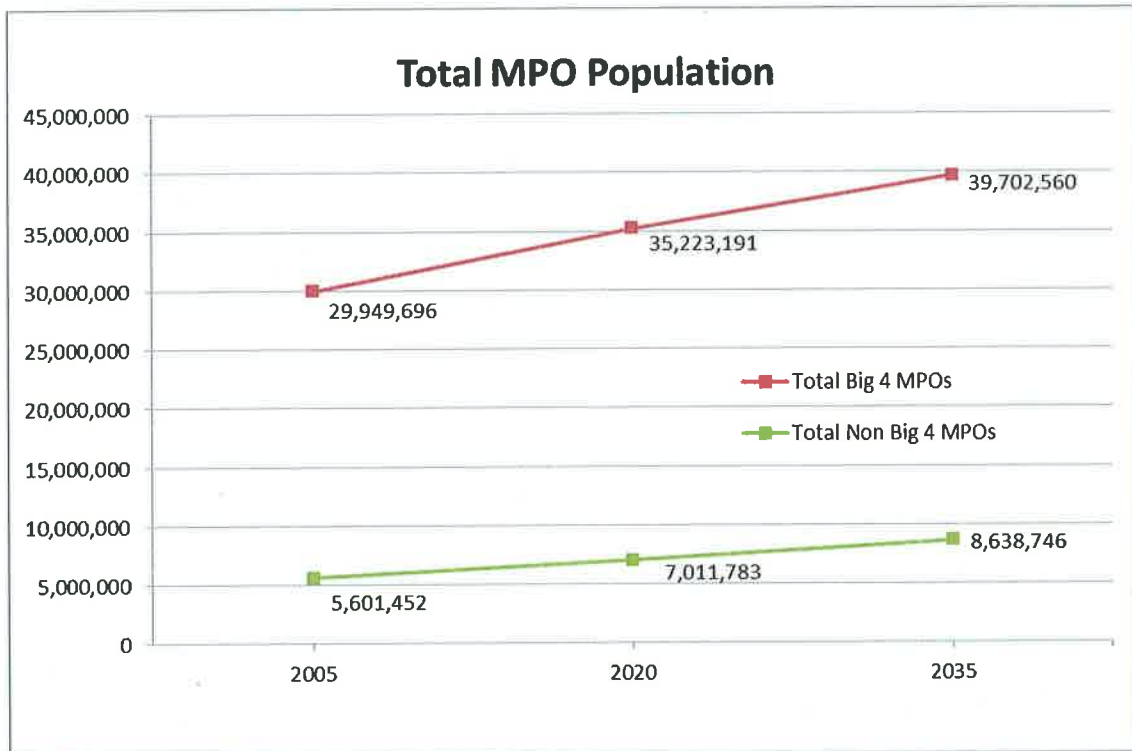


Steve Lavagnino
Chair, Santa Barbara County Association of Governments

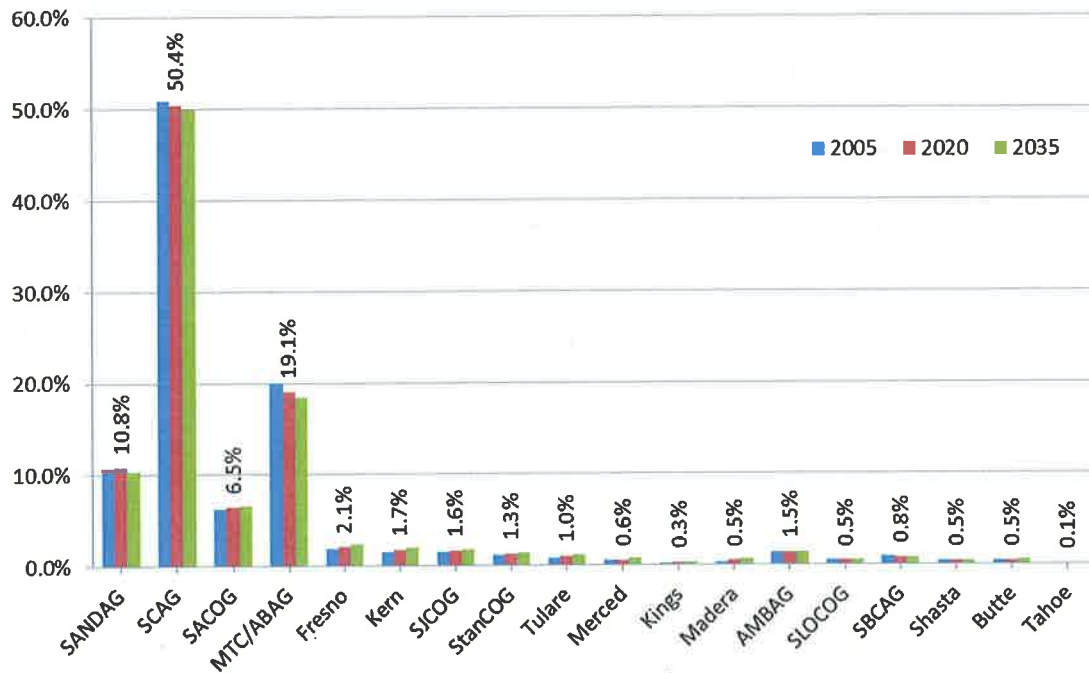
Encl.: Factsheet - Relative GHG Emissions, Big vs. Small MPOs

cc: Bill Higgins, Executive Director, CALCOG
Terry Roberts, Manager, Sustainable Communities Policy and Planning
Resources Board

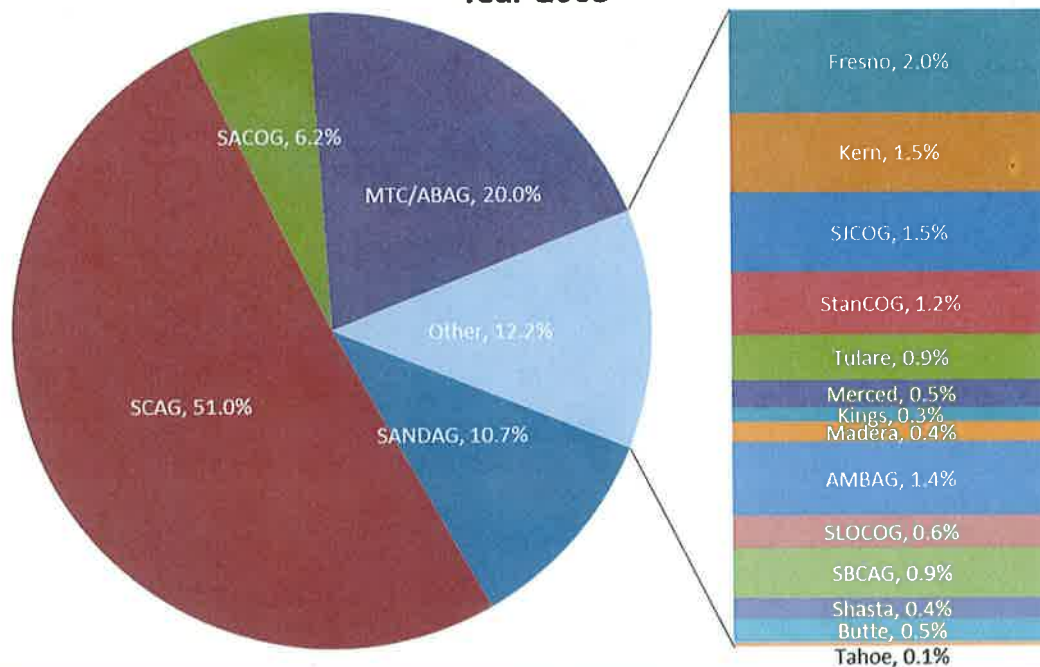
Relative GHG Emissions, Big vs. Small MPOs



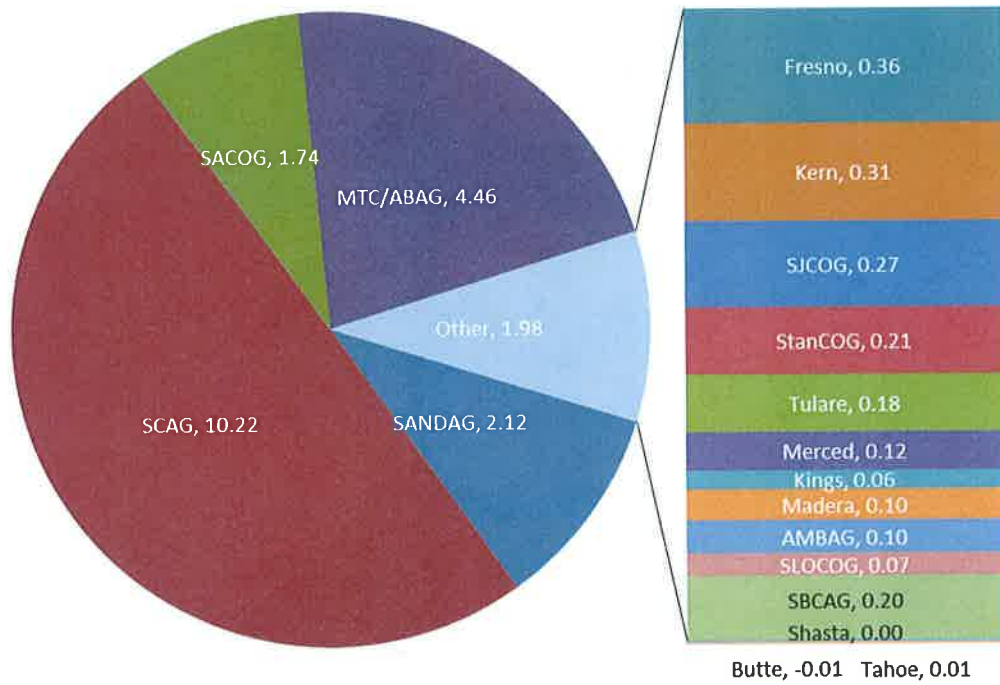
Individual MPO GHG Emissions % of Total MPO GHG Emissions % in California (MMT CO2e/year)



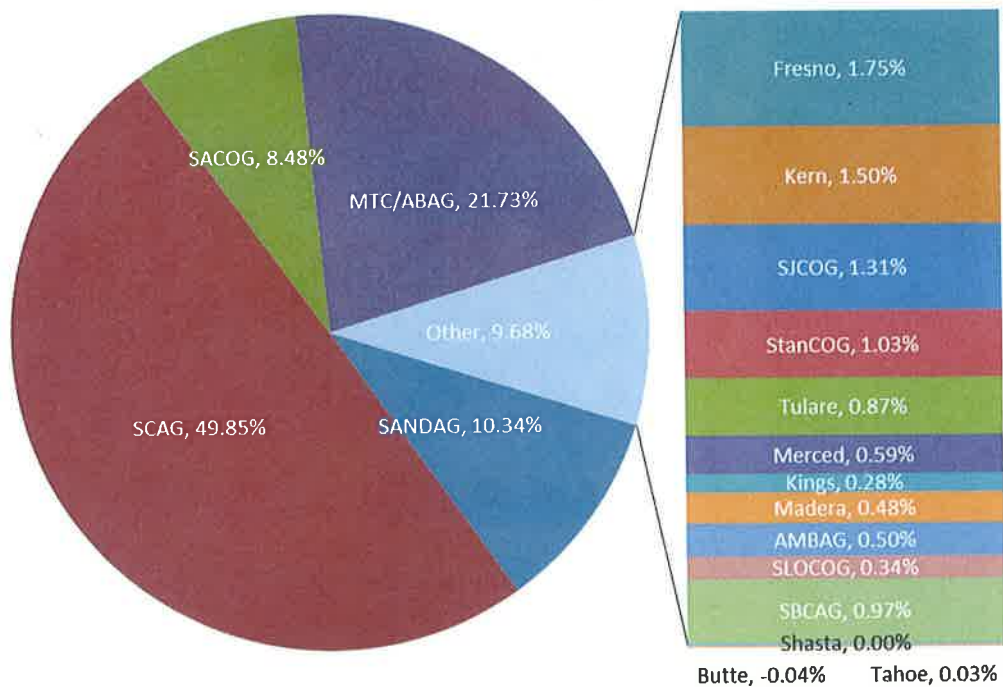
Individual MPO GHG Emissions % of Total MPO GHG Emissions % in California (MMT CO2e/year) - Year 2005



Projected 2035 GHG Reductions (MMT CO₂e/year) by MPO from 2005



Projected 2035 GHG Reductions (%) by MPO from 2005



Population Source: www.arb.ca.gov/cc/sb375/mpo.co2.reduction.calc.pdf

Targets Source: www.arb.ca.gov/cc/sb375/final_targets.pdf

Note: Projected 2035 reductions calculated as: (current per capita emissions x future population) – (projected per capita emissions x future population)